

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** § **Case No. 24-31171**  
**James Douglas Butcher** §  
§  
**Debtor** § **Chapter 11**  
§

**DEBTOR'S INTERIM FEE APPLICATION**  
**NOTICE OF DENIAL OF SUMMARY JUDGMENT**

Baker & Associates filed an Interim Fee Application on January 8, 2025 at ECF 100. The only objection filed within the 21-day period was filed by Michael Allen Franklin, secured creditor and party interest in case, on January 29, 2025 at ECF 102. Franklin's objection was pending the ruling on the Motion for Summary Judgment, which was denied at the hearing on January 30, 2025. Since the Motion for Summary Judgment was denied, there is no other basis for the objection.

WHEREFORE, Applicant respectfully requests that this court enter an Order (i) approving Applicant's request for allowance of Total Fees of \$57,923.00 and allowance of Total Expenses of \$669.40 for the period of March 20, 2024 to December 24, 2024, for the chapter 11 case and (ii) and for such other and further relief as to which this court may deem appropriate.

DATED: February 12, 2025

Respectfully submitted

*/s/ Reese W. Baker*

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**CERTIFICATE OF SERVICE**

I certify that on or about February 12, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Reese W. Baker*  
Reese W. Baker